

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability Litigation	MDL NO. 2:15-MD-02641-PHX-DGC  <b>STIPULATION OF DISMISSAL WITH PREJUDICE</b>
This document relates to the cases listed on Exhibit A attached hereto.	

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto (“Plaintiffs”) and Defendants, C.R.Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), and file this Stipulation of Dismissal with Prejudice, and in support thereof, respectfully show the court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A with prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the caes listed on Exhibit A in their entirety with prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully submitted this 11<sup>th</sup> day of March, 2021

/s/ Julia Reed Zaic  
Julia Reed Zaic  
[julia@hrzlaw.com](mailto:julia@hrzlaw.com)  
HEAVISIDE REED ZAIC  
4695 MacArthur Court, 11<sup>th</sup> Floor  
Newport Beach, CA 91660  
P: 949-7155120  
F: 949-715-5121

*Attorneys for Plaintiffs*

/s/ *Richard B. North, Jr.*  
Richard B. North, Jr.  
[richard.north@nelsonmullins.com](mailto:richard.north@nelsonmullins.com)  
NELSON MULLINS RILEY &  
SCARBOROUGH LLP  
201 17<sup>TH</sup> St. NW, Ste. 1700  
Atlanta, GA 30363  
P: 404-322-6000  
F: 404-332-6397

*Attorneys for Defendants C. R. Bard, Inc.  
and Bard Peripheral Vascular Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day March 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Marilyn B Wass